

1 MICHAEL W. FOSTER (State Bar No. 127691)
2 DANIELLE OCHS-TILLOTSON (State Bar No. 178677)
3 MARIA A. TAHMOURESIE (State Bar No. 214994)
FOSTER AND ASSOCIATES
3 610 16TH STREET, SUITE 310
OAKLAND, CALIFORNIA 94612
4 TELEPHONE: (510) 763-1900
FACSIMILE: (510) 763-5952

5
6 Attorneys for Defendant
SUN MICROSYSTEMS, INC.

7 FRANK E. MAYO (STATE BAR #42972)
LAW OFFICE OF FRANK E. MAYO
8 480 SAN ANTONIO RD., SUITE 230
MOUNTAIN VIEW, CA 94040
9 TELEPHONE: (650) 964-8901

10 Attorney for Plaintiff
FARAHNAZ TAHMASEBI

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 *E-FILED - 11/30/06*

15 FARAHNAZ TAHMASEBI,) Case No. C05 05016 RMW
16 Plaintiff,) Date Action Filed: December 5, 2005
17 vs.)
18 SUN MICROSYSTEMS, INC., a) **STIPULATION AND [PROPOSED]**
California Corporation,) **ORDER CONTINUING FURTHER CASE**
19 Defendant.) **MANAGEMENT CONFERENCE;**
20) **SUPPORTING DECLARATION**
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**DECLARATION OF DANIELLE OCHS-TILLOTSON
IN SUPPORT OF PROPOSED ORDER CONTINUING
FURTHER CASE MANAGEMENT CONFERENCE**

I, Danielle Ochs-Tillotson, hereby declare as follows:

1. I am an attorney with Foster & Associates representing defendant Sun Microsystems, Inc. in this action and have personal knowledge of the matters set forth herein and could and would testify thereto at any hearing of this matter.

2. This matter is set for a Further Case Management Conference on December 1, 2006 before this Court.

3. Frank Mayo, attorney for plaintiff Farahnaz Tahmasebi, has informed me that he intends to file a motion to withdraw from this matter as plaintiff's counsel of record (the "Motion").

4. Mr. Mayo represented to me that he would file the Motion sufficiently before the Further Case Management Conference scheduled in this matter for December 1, 2006, such that the Court could consider the issue when determining how to proceed.

5. Recently, Mr. Mayo informed me that due to scheduling conflicts, he did not file the Motion, but will do so on or before December 1, 2006.

6. For these reasons, Mr. Mayo and I have agreed to request that the Further Case Management Conference be continued to a date on or after the Court has ruled on the Motion.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 29th day of November 2006 in Oakland, California.

I. Oels. Tilolsen

Danielle Ochs-Tillotson

**STIPULATION RE CONTINUING
THE 2019 CASE MANAGEMENT CONFERENCE**

For the reasons set forth in the attached Declaration of Danielle Ochs-Tillotson in Support of Proposed Order Continuing Further Case Management Conference, plaintiff Farahnaz Tahmasebi and defendant Microsystems, Inc., by and through their counsel, hereby stipulate to request that the Further Case Management Conference set in this matter for December 1, 2006 be continued to a date on or after the Court has ruled on plaintiff's counsel Frank Mayo's Motion to Withdraw. The parties respectfully request that the Court issue an Order adopting this schedule.

SO STIPULATED.

Dated: November 29, 2006

FOSTER & ASSOCIATES

D. Debs Tillotson

MICHAEL W. FOSTER
DANIELLE OCHS-ILLOTSON
Attorneys for Defendant
SUN MICROSYSTEMS, INC.

Dated: November 29, 2005

LAW OFFICES OF FRANK B. MAYO

FRANK E. MAYO
Attorney for Plaintiff
FARAHNAZ TAHHMASEBI

**[PROPOSED] ORDER CONTINUING
FURTHER CASE MANAGEMENT CONFERENCE**

For good cause showing, the Stipulation Re Continuing Further Case Management Conference is hereby adopted by the Court as its Order in this matter. A Further Case Management Conference will be held on 2/23/07 at 10:30 in Department 6 of this Court. The parties are ordered to comply therewith.

Dated: 11/30/06

/s/ Ronald M. Whyte

UNITED STATES DISTRICT COURT JUDGE